

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Review of Part 87 of the Commission's Rules)	WT Docket No. 01-289
Concerning the Aviation Radio Service)	
)	

REPLY COMMENTS OF IRIDIUM SATELLITE LLC

Iridium Satellite LLC ("Iridium")¹ hereby replies to the proposal by Inmarsat Ventures Limited ("Inmarsat") in the above-captioned proceeding to permit Aeronautical Mobile Satellite (Route) Service ("AMS(R)S") to be provided pursuant to Part 87 of the Commission's rules in additional portions of the L-band. Iridium opposes Inmarsat's proposal, because, as explained below, the AMS(R)S operations proposed by Inmarsat would expose Iridium's operations in the adjacent 1610-1626.5 MHz band (the "1.6 GHz band") to interference from Inmarsat's out-of-band and spurious emissions, and Inmarsat has not provided any technical analysis to alleviate such concerns.

¹ Iridium is the only provider of truly global satellite voice and data solutions with complete coverage of the earth (including oceans, airways and Polar Regions). The Iridium constellation consists of 66 non-geostationary orbit ("NGSO") cross-linked satellites and has multiple in-orbit spares. The constellation operates as a fully meshed network and is the largest commercial satellite constellation in the world. Iridium delivers essential communications services to and from remote areas where no other form of communications is available and, because the access of the system is not dependent on a network of gateways, it is well suited to survive disaster situations and provide communication services in emergency situations. The Iridium service is ideally suited for industries such as maritime, aviation, government/military, emergency/humanitarian services, mining, forestry, oil and gas, heavy equipment, transportation and utilities.

In its Comments, Inmarsat proposed to expand the AMS(R)S operation, pursuant to Part 87, from the current 1646.5-1660.5 MHz allocation for the earth-to-space uplink, to one that would cover the full 1626.5-1660.5 MHz band.² Inmarsat also proposes expanded use of its Swift64 and SwiftBroadband terminals, which support multiple carriers, for AMS(R)S. If these proposals were adopted, Inmarsat's AMS(R)S operations in the 1626.5-1646.5 MHz band would be immediately adjacent to Iridium's NGSO operations in the 1.6 GHz band — a change from the existing AMS(R)S operations, which are separated from Iridium's 1.6 GHz band services by a 20 MHz guard band.

Inmarsat fails to provide any technical analysis to establish that its proposed operations, if permitted in the 1626.5-1646.5 MHz band, would not interfere with Iridium's immediately adjacent uplink and downlink operations. Inmarsat also fails to provide any technical analysis that considers the greater interference potential to Iridium's operations posed by Inmarsat's Swift64 and SwiftBroadband terminals — terminals whose operations are not currently permitted under the Commission's AMS(R)S rules.³ The interference threat from the proposed Swift64 and SwiftBroadband terminals will be even more severe because of the multiple carrier

² Comments of Inmarsat Ventures Limited, WT Docket No. 01-289, at 1 (Mar. 6, 2007) ("Inmarsat Comments"); *see also* Comments of Rockwell Collins, Inc., WT Docket No. 01-289, at 2 (Mar. 6, 2007).

³ Inmarsat Comments at 6 (noting that use of Swift64 and SwiftBroadband terminals for AMS(R)S is not permitted under Commission rules). In addition to seeking approval from the Commission, the terminals proposed to be used by Inmarsat would have to be approved by ICAO and the FAA before they could be used for safety services.

operation of such terminals, which produces more significant inter-modulation ("IM") components into the adjacent band in which Iridium operates.

Because Inmarsat has provided no supporting analysis to demonstrate how its proposed AMS(R)S operations will avoid producing unacceptable interference to Iridium's services, the Commission should reject Inmarsat's proposed AMS(R)S operations in the 1626.5-1646.5 MHz band and its proposals to modify Part 87 to permit Swift64 and SwiftBroadband terminals for AMS(R)S.

CONCLUSION

In view of the foregoing, the Commission should not permit the Part 87 AMS(R)S operations proposed by Inmarsat.

Respectfully submitted,

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April 5, 2007